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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215342
Party	Plaintiff Citigroup Inc.
Correspondence Address	JOHN P MARGIOTTA FROSS ZELNICK LEHRMAN & ZISSU PC 866 UNITED NATIONS PLAZA NEW YORK, NY 10017 UNITED STATES jm@fzlz.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	John P. Margiotta
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Signature	/John P. Margiotta/
Date	11/12/2015
Attachments	F1815568.PDF(88784 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

-----X
CITIGROUP INC.,

Opposer,

- against -

JB CARTER ENTERPRISES, LLC,

Applicant.
-----X

Opposition No.: 91215342

**CONSENTED MOTION FOR AN EXTENSION OF DISCOVERY
AND TRIAL DATES WITH CONSENT**

The answer date for Applicant is currently set for November 12, 2015 in the above-captioned proceeding. Opposer Citigroup Inc. (hereinafter "Opposer") hereby submits this motion on consent to extend such date by (60) days, or until January 11, 2016, and requests that all subsequent dates be reset accordingly. The schedule, as revised would be as follows:

Time to Answer	1/11/2016
Deadline for Discovery Conference	2/10/2016
Discovery Opens	2/10/2016
Initial Disclosures Due	3/11/2016
Expert Disclosures Due	7/9/2016
Discovery Closes	8/8/2016
Plaintiff's Pretrial Disclosures	9/22/2016
Plaintiff's 30-day Trial Period Ends	11/6/2016
Defendant's Pretrial Disclosures	11/21/2016
Defendant's 30-day Trial Period Ends	1/5/2017
Plaintiff's Rebuttal Disclosures	1/20/2017

In the last Order in this matter, dated September 14, 2015, the Board granted the parties' September 12, 2014 motion for an extension of dates. In doing so, the Board noted that the parties had a continuing obligation to provide good cause in the form of detailed progress reports.

Since that time, the parties have continued to discuss settlement, and were in contact with each other on September 17; October 8, 19 and 28; and on November 6 and 11 regarding settlement. Applicant has provided substantive comments on a comprehensive written settlement agreement, and is awaiting a further set of comments from Opposer. The issues remaining to be resolved are very narrow, and the parties believe that the additional sixty (60) days will be sufficient to conclude the settlement agreement, or to ascertain that settlement is not to be forthcoming.

Though this motion is being filed by Opposer's counsel, Opposer has sought and received the consent of counsel for Applicant.

Dated: New York, New York
November 12, 2015

Respectfully submitted,

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: 

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Attorneys for Opposer Citigroup Inc.

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of this document on Applicant's counsel, Mark Borghese, Esq., by email to mark@borgheselegal.com on this 12th day of November, 2015.



John P. Margiotta